

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: Alecia Vickers

 Debtor.

) Case Number: 20-13108
) Chapter 13 Proceedings
) Judge Jessica E. Price Smith

TRUSTEE’S OBJECTION TO DEBTOR’S MOTION TO MODIFY PLAN

Now comes **LAUREN A. HELBLING**, the duly appointed and qualified Standing Chapter 13 Trustee (“Trustee”) herein, by and through counsel, and hereby objects to the Debtor’s Motion to Modify Plan filed with this Court on October 1, 2020 (hereinafter “Debtor’s Motion”). In support of her objection, the Trustee makes the following representations to the Court:

1. The Trustee’s Objection to Confirmation filed August 27, 2020, is still outstanding, specifically the Prosecution, Omitted Claims, and Liquidation paragraphs.

WHEREFORE your Trustee, being a proper party in interest, hereby moves this Honorable Court to deny the Debtor’s Motion for the reasons cited.

Respectfully submitted,

/s/ Holly Davala

HOLLY DAVALA #0070447

Staff Attorney for Chapter 13 Trustee

Office of the Chapter 13 Trustee, Lauren A. Helbling

200 Public Square, Suite 3860

Cleveland, OH 44114-2321

Phone: (216) 621-4268 Fax: (216) 621-4806

ch13trustee@ch13cleve.com

CERTIFICATE OF SERVICE

I certify that on October 6, 2020, a true and correct copy of Trustee's Objection was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Renee Heller, Attorney, on behalf of Debtor at rhlegal@aol.com

/s/ Holly Davala

HOLLY DAVALA #0070447

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10/6/20